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July 18, 2003

VIA ELECTRONIC SUBMISSION

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20054

Re: Verizon's June 13, 2003 *ex parte* Presentation in CC Docket No. 01-92

Dear Ms. Dortch:

By letter dated June 13, 2003, Verizon provided notice of an *ex parte* meeting with certain individuals in the Federal Communications Commission's ("Commission") Pricing Policy Division to discuss the above-referenced proceeding. As part of the notice, Verizon included a copy of handout distributed to the meeting participants. The last page of the handout contained a slide about Vonage Holding Corp.'s ("Vonage") information service offering. Vonage is submitting this letter in response to Verizon's June 13, 2003 *ex parte* presentation.

Verizon's letter does not indicate how it verbally portrayed Vonage's information service offering during the meeting. However, the slide is titled "Vonage's non-traditional use of Central Office Codes" and includes a number of purported quotes from the Company's website. Vonage would like to highlight the fact that the Industry Numbering Committee ("INC") has established a Voice over Internet Protocol ("VoIP") Workshop that is currently examining issues relating to the use of numbering codes in connection with the delivery of VoIP services. Verizon has been actively involved in this Workshop, along with many other industry participants including Vonage. In fact, a Verizon employee is co-chairman of the INC's VoIP Workshop.

Vonage is surprised to learn that Verizon has characterized the Company's use of Central Office Codes as "non-traditional." Verizon is well aware, through its participation and co-chairmanship of the VoIP Workshop, that this very issue is unresolved and there is no agreement that use of numbering codes by any VoIP providers, including Vonage, constitutes a "non-traditional" use of numbering codes. In fact, at this point in the VoIP Workshop, there is no consensus as to what comprises a "traditional" use of Central Office Codes. The work of the

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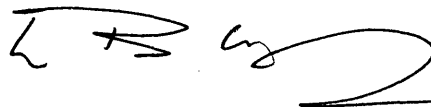
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VoIP Workshop is ongoing, and this issue continues to be actively examined by INC members and VoIP Workshop participants.

Because Vonage is not a telecommunications carrier, it must purchase telecommunications services as an end-user. Although Vonage offers an innovative service, there is nothing “non-traditional” about the way the underlying telecommunications carrier obtains numbering resources and assigns those numbers for Vonage’s use. Vonage’s use of these numbering resources cannot transform valid number assignments into a “non-traditional” use of Central Office Codes. Vonage purchases both Primary Rate Interface (“PRI”) and Direct Inward Dial (“DID”) lines from telecommunications carriers. These telecommunications services include telephone numbers. Any business or individual can purchase PRI and DID lines from telecommunications carriers through the relevant carrier tariff. Vonage uses PRI and DID lines as inputs for the information service offering it provides to its customers.

VoIP is an emerging and evolving technology that is still in its infancy. VoIP provides customers with quality, innovative services at competitive rates. VoIP allows end-users to implement features and function changes that once could only be accomplished in the circuit switched telephone network and even now can only be implemented in the circuit switched network through switch level changes performed by a carrier. As a result of VoIP technology, small businesses and residential users are able to take immediate advantage of new functions and features that had previously only been available to medium- and large-sized companies. While VoIP challenges incumbent providers of telephone service in terms of features and quality of service, VoIP providers do not use Central Office Codes in a “non-traditional” manner.

Respectfully submitted,



William B. Wilhelm, Jr.
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Attorneys for Vonage Holding Corp.

cc: Tamara Preiss
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